## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

NEW YORK HOTEL & MOTEL TRADES COUNCIL, AFL-CIO,

Civil Action No. 1:16-cv-05248(LAP)

Petitioner,

-against-

CF 43 HOTEL, LLC; 250 WEST 43 OWNER LLC; 250 WEST 43 OWNER II LLC; 250 WEST 43 OWNER III LLC, d/b/a CARTER HOTEL,

Respondents.

## **NOTICE OF MOTION**

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law, and all prior pleadings and accompanying exhibits, and proceedings herein, Petitioner New York Hotel & Motel Trades Council, AFL-CIO (the "Union"), by its attorneys Pitta LLP, hereby moves this Court, before the Honorable Loretta A. Preska, United States District Court Judge, in the United States Courthouse for the Southern District of New York, 500 Pearl Street, New York, New York, for an order granting the Union's motion to confirm the arbitration awards of the Office of the Impartial Chairperson, Award No. 2015-37 and 38 dated July 3, 2015, and Award No. 2016-16 dated April 15, 2016, against Respondents CF 43 Hotel LLC et al ("Hotel").

PLEASE TAKE FURTHER NOTICE that, in accordance with the order of this Court dated March 31, 2017, any opposition/cross-motion papers must be filed and served by no later

than June 5, 2017, Union reply/opposition papers by June 16, 2017, and any Hotel reply papers by June 27, 2017.

Dated: May 4, 2017

New York, New York

PITTA LLP

Attorneys for Petitioner Union

Bv

Barry N. Saltzman

(bsaltzman@pittalaw.com)

Andrew D. Midgen

(Amidgen@pittalaw.com)

120 Broadway, 28th Floor

New York, New York 10271

(212) 652-3890 (phone)

(212) 652-3891 (fax)

TO: Arthur J. Robb, Esq.
Clifton Budd & DeMaria, LLP
350 Fifth Avenue, 61<sup>st</sup> Floor
New York, NY 10118
(212) 687-7410
(212) 687-3285 (fax)